

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CARL HEMPHILL,)	
)	
Plaintiff,)	
)	
v.)	15-cv-04968
)	
GHALIAH OBAISI, <i>et al.</i> ,)	Judge Sharon Johnson Coleman
)	
Defendants.)	

DEFENDANTS' MOTION FOR SUMMARY JUDGMENT

Defendants, Michael Lemke, Doretta O'Brien, and Louis Shicker, through their attorney, Kwame Raoul, Attorney General for the State of Illinois, move under Local Rule 56.1 and Rule 56, for summary judgment and state as follows:

Defendants should be granted summary judgment, because they were not personally involved in the alleged Eight Amendment violations, and they did not act with deliberate indifference to Plaintiff's alleged serious medical need. Plaintiff inmate filed his Second Amended Complaint under § 1983 against former or current Illinois Department Correction employees alleging their deliberate indifference to Plaintiff's serious medical need. Defendants filed a Memorandum of Law and a Local Rule 56.1 Statement of Facts, with documentation, in support of this motion.

WHEREFORE, Defendants respectfully requests this Court grant them summary judgment, and for any other relief this Court deems just and proper.

Respectfully submitted,

KWAME RAOUL
Attorney General for Illinois

/s/ Shawn M. Peters
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CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2019, I electronically filed the foregoing document with the clerk of the court for the Northern District of Illinois, using the electronic case filing system of the court.

/s/ Shawn M. Peters